

1 Honorable John C. Coughenour
2 Honorable Richard A. Jones
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UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 v.

12 ALAN GOMEZ-MARENTES, et al.,

13 Defendants.

14 UNITED STATES OF AMERICA,

15 Plaintiff,

16 v.

17 CESAR VALDEZ-SANUDO, et al.,

18 Defendants.

CASE NO. CR20-092JCC

NOTICE OF RELATED CASES

NO. CR20-217RAJ

NOTICE OF RELATED CASES

21 Comes now the United States of America, by Brian T. Moran, United States
22 Attorney for the Western District of Washington, and Amy Jaquette and Marci L.
23 Ellsworth, Assistant United States Attorneys for said District, and respectfully submits
24 the following Notice of Related Cases pursuant to Local Criminal Rule 13(a) and (b).
25 The two cases captioned above are related cases.

26 On July 23, 2020, the Grand Jury charged Alan GOMEZ-MARENTES and 18
27 other members of a large drug trafficking organization (DTO) with one count of
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NOTICE OF RELATED CASES

United States v. ALAN GOMEZ-MARENTES, et al., CR 20-092JCC
United States v. CESAR VALDEZ-SANUDO, et al., CR 20-217RAJ - 1

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1 Conspiracy to Distribute Controlled Substances, in violation of Title 21, United States
 2 Code, Sections 841(a)(1), 841(b)(1) and 846 (Count 1), and two of those individuals in a
 3 related count of Conspiracy to Commit Money Laundering (Count 4), in violation of Title
 4 18, United States Code, Section 1956. (CR 20-092JCC, Dkt. 1.) On July 28, 2020,
 5 agents arrested many of the 19 indicted defendants during a coordinated takedown of the
 6 investigation. On August 7, 2020, the grand jury returned a Superseding Indictment
 7 charging a number of substantive counts and adding one additional defendant. (CR 20-
 8 092JCC, Dkt. 152.)

9 The July 28, 2020 takedown was the culmination of more than a year of
 10 investigation into a DTO distributing multi-kilogram quantities of narcotics in Western
 11 Washington. The investigation was led by the Drug Enforcement Administration, in
 12 partnership with Homeland Security Investigations, the Bureau of Alcohol, Tobacco,
 13 Firearms, and Explosives, and the Federal Bureau of Investigation. The investigation
 14 began in January 2019 and involved numerous periods of court-authorized wiretaps,
 15 controlled purchases of drugs using confidential sources, and hundreds of hours in
 16 physical and electronic surveillance.

17 At the time of the takedown in CR 20-092 JCC, investigators elected to hold off
 18 on indicting (or arresting) a subset of the targets of the investigation – specifically, Cesar
 19 VALDEZ-SANUDO and his criminal associates. Rather, agents continued to investigate
 20 this group of individuals and received court-authorization to conduct additional wiretaps.

21 On December 9, 2020, the Grand Jury returned an Indictment charging this subset
 22 of the larger investigation in a separate conspiracy. This Indictment charged 11 members
 23 of a DTO with one count of Conspiracy to Distribute Controlled Substances, in violation
 24 of Title 21, United States Code, Sections 841(a)(1), 841(b)(1) and 846 (Count 1), and two
 25 of those individuals in a related count of Conspiracy to Commit Money Laundering
 26 (Count 3), in violation of Title 18, United States Code, Section 1956. (CR20-217RAJ,
 27 Dkt. 1.) On December 16, 2020, agents arrested the 11 indicted defendants during a
 28 coordinated takedown of the investigation.

NOTICE OF RELATED CASES

United States v. ALAN GOMEZ-MARENTES, et al., CR 20-092JCC
United States v. CESAR VALDEZ-SANUDO, et al., CR 20-217RAJ – 2

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1 These two cases are related, as they rely in large part on the same wiretap
2 pleadings, involve common co-conspirators, and contain instances of overlapping
3 surveillance. Due to the overlap between the two cases (CR20-092JCC and CR20-
4 217RAJ), the United States files this notice of related cases and requests that both cases
5 be assigned to the same judge. The United States does not intend to join the cases for
6 trial; however, it does seek to litigate any challenges to the underlying investigation –
7 which will necessarily rely on common issues of law and fact – before the same Court.

8 DATED this 21st day of December, 2020.

9 Respectfully submitted,

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11 UNITED STATES ATTORNEY

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